



Mark R. Natale, Esquire.
mnatale@malamutlaw.com
Phone (856) 424-1808
Fax (856) 424-2032

The Honorable Zahid N. Quraishi
United States District Judge, District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 2020
Trenton, NJ 08608

March 25, 2024

RE: Kim, et al. v. Hanlon, et al.
3:24-cv-01098-ZNQ-TJB

Dear Judge Quraishi,

I represent Defendant Burlington County Clerk in the above referenced matter. I write to respond to a letter filed by Senate Candidate Dr. Patricia Campos-Medina, in response to my letter requesting a case management conference. I am asking the court not to consider this letter at all and strike it from the record.

Dr. Patricia Campos Medina is a well – respected political leader, activist, educator, and Senate candidate. However, in this proceeding, she is neither party, nor intervenor, nor amici – despite having ample opportunity to do so pursuant to Your Honors orders. It seems only now, after the evidentiary hearing and final briefing deadline has passed, that Dr. Campos Medina has decided to hire a prominent election attorney and join the conversation.

If a prior unsolicited letter was described by Your Honor as hailing “from the cheap seats”, this one is from the parking lot outside the arena. The letter fundamentally confuses what is before Your Honor. This court is not considering a political question. It is not considering a policy question. It is considering a routine question of civil procedure, specifically whether a preliminary injunction is appropriate on this record. In that context, Dr. Campos Medina declined the multiple opportunities she had to be heard.

The fact that Dr. Campos Medina suddenly feels compelled to appear on the docket underlines the point of my prior letter – the paradigm of this entire process has shifted, and the court cannot rule on the present evidentiary record.

Cherry Hill | Hoboken | Philadelphia

Main Office: 457 Haddonfield Road, Suite 500, Cherry Hill, NJ 08002

 866-4MALAMUT |  856 424 2032

www.MalamutLaw.com

Therefore, it is respectfully requested that the letter be stricken from the record and not considered by Your Honor.

Respectfully submitted,

/s/ Mark R. Natale, Esq.

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